

# Exhibit 4

**Subject:** RE: United States v. Zackary Ellis Sanders, 1:20-cr-00143

**Date:** Monday, January 25, 2021 at 5:27:03 PM Eastern Standard Time

**From:** Clayman, William G (USAVAE)

**To:** Jade Chong-Smith, Prabhu, Jay (USAVAE)

**CC:** Jon Jeffress, Emily Voshell

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know that the content is safe.

Hi Jade,

We have complied with our discovery obligations and will continue to do so, and you will receive all discovery material to which you are entitled. None of the information you are requesting in your discovery letter is material or relevant to this case under any applicable discovery standard. I will nevertheless place screenshots of the Target Website in a shared drive on USAfx, including screenshots from January 2019 of the registration page and the login page, and will share access with you. We are providing these pursuant to the Protective Order.

Best,  
Bill

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**From:** Jade Chong-Smith <jchong-smith@kaiserdillon.com>

**Sent:** Friday, January 22, 2021 6:04 PM

**To:** Clayman, William G (USAVAE) <WClayman@usa.doj.gov>; Prabhu, Jay (USAVAE) <JPrabhu@usa.doj.gov>

**Cc:** Jon Jeffress <jjeffress@kaiserdillon.com>; Emily Voshell <EVoshell@kaiserdillon.com>

**Subject:** United States v. Zackary Ellis Sanders, 1:20-cr-00143

Hello Jay and Bill,

Please see the attached discovery letter in *United States v. Zackary Ellis Sanders, 1:20-cr-00143*.

Thank you,

Jade

Jade Chong-Smith

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